

# PHA Plans

## Streamlined 5-Year/Annual Version

U.S. Department of Housing and  
Urban Development  
Office of Public and Indian Housing

OMB No. 2577-0226  
(exp 08/31/2009)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937 that introduced 5-year and annual PHA Plans. The full PHA plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form allows eligible PHAs to make a streamlined annual Plan submission to HUD consistent with HUD's efforts to provide regulatory relief to certain PHAs. Public reporting burden for this information collection is estimated to average 11.7 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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## Streamlined 5-Year Plan for Fiscal Years 2005 - 2009

## Streamlined Annual Plan for Fiscal Year 2007

**MASSACHUSETTS DEPARTMENT OF HOUSING  
AND COMMUNITY DEVELOPMENT (DHCD)**

**APRIL 16, 2007**

All responses are highlighted in yellow

**NOTE:** This PHA Plan template (HUD-50075-SA) is to be completed in accordance with instructions contained in previous Notices PIH 99-33 (HA), 99-51 (HA), 2000-22 (HA), 2000-36 (HA), 2000-43 (HA), 2001-4 (HA), 2001-26 (HA), 2003-7 (HA), and any related notices HUD may subsequently issue. Full reporting for each component listed in the streamlined Annual Plan submitted with the 5-year plan is required.

## Streamlined Five-Year PHA Plan Agency Identification

**PHA Name:** Massachusetts Department of Housing and Community  
Development (DHCD)

**PHA Number:** MA 901

**PHA Fiscal Year Beginning:** July 1, 2007

### PHA Programs Administered:

☐ Public Housing and Section 8

Number of public housing units:

Number of S8 units:

☒ Section 8 Only

Number of S8 units: 18,762

☐ Public Housing Only

Number of public housing units:

☐ **PHA Consortia:** (check box if submitting a joint PHA Plan and complete table)

Participating PHAs	PHA Code	Program(s) Included in the Consortium	Programs Not in the Consortium	# of Units Each Program
Participating PHA 1:				
Participating PHA 2:				
Participating PHA 3:				

### Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting:  
(select all that apply)

- ☒ Main administrative office of the PHA  
☐ PHA development management offices  
☐ PHA local offices

### Display Locations For PHA Plans and Supporting Documents

The PHA Plans and attachments (if any) are available for public inspection at: (select all that

apply)

- ☒ Main administrative office of the PHA
- ☐ PHA development management offices
- ☐ PHA local offices
- ☐ Main administrative office of the local government
- ☐ Main administrative office of the County government
- ☐ Main administrative office of the State government
- ☐ Public library
- ☒ PHA website
- ☐ Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- ☒ Main business office of the PHA
- ☐ PHA development management offices
- ☐ Other (list below)

## **Streamlined Five-Year PHA Plan**

### **PHA FISCAL YEARS 2005 - 2009**

[24 CFR Part 903.12]

#### **A. Mission**

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- ☒ The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

- ☒ The PHA's mission is: The mission of DHCD is to strengthen cities, towns and neighborhoods to enhance the quality of life of Massachusetts residents. To accomplish our mission, we will provide leadership, professional assistance and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. We will forge partnerships with regional and local governments, public agencies, community based organizations and the business community to achieve our common goals and objectives. In all of these efforts, we will recognize and respect the diverse needs, circumstances and characteristics of individuals and communities.

#### **DHCD is committed to:**

- Programs and funding that primarily target populations of low to moderate incomes and those with special needs.
- Coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities.
- Programs and technical assistance designed to facilitate informed decision-making at the local level, and to encourage self-sufficiency of residents and communities.

- Sound business practices that ensure the highest standards of public accountability and responsibility.

## B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAs ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

### HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

☒ PHA Goal: Expand the supply of assisted housing  
Objectives:

- ☒ Apply for additional rental vouchers:
- ☐ Reduce public housing vacancies:
- ☒ Leverage private or other public funds to create additional housing opportunities:
- Continue to link DHCD PBV vouchers with various affordable housing developments undertaken by DHCD and MassHousing.
- DHCD has not set a fixed limit on the number of PBVs it will seek to bring onto its program; however, DHCD will not exceed the 20% limit of its budget authority established by Congress for this purpose.
- Based on DHCD's leasing projections for CY 2007, DHCD will solicit "development" PBV applications through both the DHCD Winter and Fall 2007 One Stop Affordable Housing Rental Competitions and MassHousing's Affordable Housing Trust Fund competition - for projects that will come on line beginning in CY 2008.
- Link DHCD PBVs with preservation projects, to the extent budget and voucher authority permit, to preserve housing that might otherwise no longer be available to low income households.
- In CY 2007, 173 new PBV units that were selected in previous competitions will come on line.
- ☐ Acquire or build units or developments
- ☐ Other (list below)

☒ PHA Goal: Improve the quality of assisted housing  
Objectives:

- ☐ Improve public housing management: (PHAS score)
- ☒ Improve voucher management: (SEMAP score) DHCD has been a SEMAP High Performer PHA for several years. In FY 2006 we experienced some unanticipated data

entry problems and missed this designation by 1 percentage point, receiving a “standard performer” designation. We fully intend to reclaim our High Performer distinction in FY 2007.

☒ Increase customer satisfaction:

☒ Concentrate on efforts to improve specific management functions:

(list; e.g., public housing finance; voucher unit inspections) Especially in the area of management information systems.

☐ Renovate or modernize public housing units:

☐ Demolish or dispose of obsolete public housing:

☐ Provide replacement public housing:

☐ Provide replacement vouchers:

☐ Other: (list below)

☒ PHA Goal: Increase assisted housing choices

Objectives:

☒ Provide voucher mobility counseling: If administrative fees permit.

☒ Conduct outreach efforts to potential voucher landlords

☒ Increase voucher payment standards When and if necessary, based upon a continual review of rental market trends.

☒ Implement voucher homeownership program: In previous years, DHCD has been reluctant to implement a voucher homeownership program. Helping clients become successful homeowners is a very labor intensive undertaking. Without adequate administrative fees for qualified staff to support our clients in this endeavor, we have not implemented this initiative. However, in 2007, DHCD and its eight regional administering agencies (RAA) will carefully reconsider this position. We believe that we *may* be able to support a very small and targeted program for our FSS participants and graduates. Further, all the RAAs will continue to provide linkages to and information and referral about regional and local homeownership programs and resources to all voucher holders pursuing homeownership opportunities.

☐ Implement public housing or other homeownership programs:

☐ Implement public housing site-based waiting lists:

☐ Convert public housing to vouchers:

☐ Other: (list below)

### HUD Strategic Goal: Improve community quality of life and economic vitality

☐ PHA Goal: Provide an improved living environment

Objectives: Not applicable. DHCD does not manage federal public housing.

☐ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:

☐ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:

☐ Implement public housing security improvements:

☐ Designate developments or buildings for particular resident groups (elderly, persons with disabilities)

☐ Other: (list below)

## HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

**X** PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

☐ Increase the number and percentage of employed persons in assisted families:

**X** Provide or attract supportive services to improve assistance recipients' employability:

**X** Provide or attract supportive services to increase independence for the elderly or families with disabilities.

Re: Elderly Services: In 2006, DHCD executed a PBV HAP contract for an assisted living facility in Boston, totaling 41 units and a PBV HAP contract for an assisted living-like facility in Westhampton, MA with 3 units.

Re: Supportive Services for Households with Disabilities: Several of DHCD's special set-aside programs for the disabled and those with other special needs are designed to work in tandem with supportive services. A description of each of these respective programs is included in DHCD's Section 8 Administrative Plan, Chapters 18-30.

**X** Other: (list below) When appropriate, refer applicants and participants to agencies that provide supportive services to assist victims of domestic violence, dating violence, sexual assault or stalking to obtain or maintain safe and affordable housing.

## HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

**X** PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

**X** Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability: : See discussion in Executive Summary on DHCD's regional tenant selection preference and possible changes if selection data suggest an unintended disparate impact that adversely delays selection wait times for minority applicants in certain parts of the Commonwealth.

**X** Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:

**X** Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:

**X** Other: Promote homeownership by linking interested households with RAA in-house and/or local community-based first time homeownership preparation programs and resources.

## **Other PHA Goals and Objectives: (list below)**

### Advocacy and Support for HCVP Stakeholders in MA

Congress and HUD continue to make (or propose to make) very significant changes to both the funding and management requirements of the Section 8 HCVP. DHCD is pleased that Congress restored over \$500m in budget authority to the program for FY 2007; however restoration of these funds will not provide new voucher authority for DHCD. One of DHCD's key goals will continue to be taking a leadership role in the Commonwealth by helping all HCVP stakeholders in MA understand the context for and the specifics of both the funding and programmatic changes being discussed and implemented by HUD. When appropriate, DHCD will provide input to HUD and Congress on potential changes, seek clarifications, and share information about effective implementation strategies. DHCD will also continue to actively support the Commonwealth's nine Housing Consumer Education Centers (HCEC). These nine strategically located and highly effective centers serve as one-stop clearinghouses for valuable information, referrals and education for all housing consumers, including renters, landlords, current and prospective homeowners and housing advocates.

### Advocacy and support for victims of domestic violence, dating violence, sexual assault or stalking

Participate in coalitions with organizations that promote safety and security in housing for such victims and provide education and informational materials for participants, applicants, housing providers and regional administering agency staff. Solicit input from domestic violence and rape service providers and others that work with victims of domestic violence, dating violence, stalking and sexual assault in designing policies to promote safety, producing educational materials and, drafting notices for participants, applicants, landlords, housing providers and regional administering agency staff regarding their rights and obligations.

## Streamlined Annual PHA Plan

### PHA Fiscal Year 2007

[24 CFR Part 903.12(b)]

### Table of Contents

Provide the following table of contents for the streamlined Annual Plan submitted with the Five-Year Plan, including all streamlined plan components, and additional requirements, together with the list of supporting documents available for public inspection.

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	a. PHA Progress on Meeting 5-Year Mission and Goals	
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	iii. PHA Statement of Consistency with Consolidated Plan	
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<input type="checkbox"/>	10. Project-Based Voucher Program	42-43
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<input type="checkbox"/>	12. FY 20__ Capital Fund Program and Capital Fund Program Replacement Housing Factor, Annual Statement/Performance and Evaluation Report	NA
<input type="checkbox"/>	13. Capital Fund Program 5-Year Action Plan	NA
<input type="checkbox"/>	14. Other (List below, providing name for each item):	Policies to assist victims of domestic violence, dating violence, sexual assault or stalking and notices to participants and landlords participating in the program regarding DHCD policies regarding such victims. In designing all such policies solicit input from domestic violence and rape service providers and others that work with victims of domestic violence, dating violence, stalking and sexual assault.

#### B. SEPARATE HARD COPY SUBMISSIONS TO LOCAL HUD FIELD OFFICE

**Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans;**

**Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.**

For PHAs APPLYING FOR CAPITAL FUND PROGRAM (CFP) GRANTS:

**Form HUD-50070, Certification for a Drug-Free Workplace;**



**Form HUD-50071, *Certification of Payments to Influence Federal Transactions*;  
Form SF-LLL & SF-LLLa, *Disclosure of Lobbying Activities*.**

**Executive Summary (optional)**

[903.7(r)]. If desired, provide a brief overview of the contents of the streamlined 5-Year/Annual Plan.

*This executive summary will address many of the comments received at DHCD's March 23, 2007 public hearing and written comments received by April 6, 2007.*

**1. REGIONAL RESIDENCY SELECTION PREFERENCE AND POSSIBLE CONSEQUENCE OF DISPARATE IMPACT ON WAITING TIMES FOR MINORITY APPLICANTS**

In its February 28, 2007 draft annual PHA Plan, DHCD alerted its stakeholders that it had been challenged by Mass Law Reform Institute (MLRI), on behalf of its clients, to eliminate or significantly modify the use of regional residency preferences in order to avoid the actual, or likely, discriminatory effect on applicants of color on the waiting lists. The language from the draft plan (quoted below) provided a brief history and context for MLRI's challenge:

***Regional Tenant Selection Preference and Possible Consequence of Disparate Impact***

*In 1996 when DHCD first contemplated using a regional residency preference for its eight regional programs, Mass Law Reform Institute (MLRI), working with the Massachusetts Coalition for the Homeless and other clients, advised DHCD, in writing, of their concern that implementation of such a system might result in a disparate impact in selection wait times for minority applicants in certain regions. When DHCD implemented this preference in 2000, both DHCD and MLRI agreed that we would monitor the selection data and take corrective action, if required, to avoid any discriminatory effect.*

*In 2002, MLRI and DHCD engaged in a very informal experiment to track the selection waiting times for a fictional applicant that DHCD placed on each regional list on the same date and time. By January 2007, this fictional applicant had been selected by four of the eight regional agencies. These four agencies have relatively low percentages of minorities on their respective waiting lists.*

*In 2003, minorities comprised approximately 66% of all DHCD applicants statewide. The four agencies that have not selected this fictional applicant contain 2/3 of all applicants and a generally higher share of minorities. As a result of this informal experiment DHCD is currently performing an analysis of its waiting list selection data.*

*If the results indicate a disparate impact DHCD will identify all possible mitigation options and determine the most appropriate response for corrective action. As required by HUD regulation, any change in the organization of a PHA's waiting list is considered a "significant" amendment to the PHA Plan, and DHCD will hold a public hearing prior to making any change, if such a change is warranted.*

**COMMENTS**

Several stakeholders responded to MLRI's challenge to DHCD including: Berkshire Community Action Council, Inc; Berkshire Housing Development Corporation; City of Pittsfield, MA; Greater Boston Legal Services; Housing Assistance Corporation; Mass Law Reform Institute; Metropolitan Boston Housing Partnership; and the United Veterans of America, Inc.

These respondents expressed differing opinions about how DHCD should address the issue of disparate impact, ranging from fully supporting abolition of regional residency preferences to maintaining both this preference and DHCD's current distribution of its vouchers to its eight leasing jurisdictions. Some respondents framed their responses around the larger issue of housing need in their respective leasing jurisdiction and others presented their views both in the context of regional and statewide housing need. For example, Greater Boston Legal Services (GBLS) made very specific requests in this regard, asking that DHCD include... "a statement of jurisdiction-wide needs for housing resources among different groups (broken down by race/ethnicity, disability status, and other household characteristics.) This is the way to help analyze whether DHCD's programs as a whole, or the individual regional non-profits, are adequately addressing housing needs..." In a different vein, The Berkshire Community Action Council, Inc. said that "The Mass Law Reform Institute claim that the current system of regional preference causes a disparate impact on racial minorities is a serious assertion that must be addressed by DHCD. But it must be acknowledged that the unacceptably long waiting lists pointed to by MLRI are the result of a severe shortage of rental assistance in the Commonwealth...Further, the intent of the regional preference is to ensure that this statewide program does not discriminate against residents of less populated counties." Other themes that were conveyed by the respondents included relationship of DHCD's regional voucher allocations to regional poverty levels, regional distribution of homeless households entering shelter; regional distribution of poverty levels, and caution that any change that might occur consider both the civil and fair housing rights of other populations, including the disabled, the elderly, veterans, and victims of domestic violence.

## RESPONSE

DHCD is committed to assuring that all applicants, regardless of race or ethnicity, are treated equally and fairly. All of the comments we received were thoughtful and frequently supported by data to demonstrate a particular aspect of their argument. As GBLS has suggested, DHCD is currently undertaking a very focused analysis of jurisdiction-wide needs for housing resources among each of our eight region's respective population. We are using data from the 2000 census, our own waiting list database, our Consolidated Plan, the Analysis of Impediments to Fair Housing and other sources that we may identify.

We will shortly engage in internal discussions with DHCD policy and legal staff to review all these public comments in the context of this data. Ultimately, we must determine how to responsibly respond both to MLRI's challenge and our stakeholders. Our response could include the following possible actions:

1. Maintain the status quo.
2. Abolish regional residency preferences and perform selections in chronological order, based upon date and time of application, from the statewide waiting list.
3. Reallocate vouchers based upon disparate impact and housing needs data to our eight regional administering agencies.
4. Establish new regions based upon disparate impact and housing needs data.
5. A combination of some of the recommendations noted above.
6. An action not yet identified.

Perversely, the only positive consequence of not being able to issue vouchers during calendar year 2007 (because we project to be fully leased throughout the year) is that we have adequate time to make the best possible determination about how to proceed. We will not implement any change to waiting list preferences without first holding a public hearing to announce such a change and to provide for further public comment. We expect to complete this process before we begin issuing vouchers for calendar year 2008.

## **2. TARGETED PROGRAMS FOR PERSONS WITH SPECIAL NEEDS**

### **COMMENTS**

Both JRI Health and Metropolitan Boston Housing Partnership commented on DHCD's set-aside programs targeted to populations with special needs.

1. Both agencies support our proposal to require pre-screening of applicants for these set-aside waiting lists in order to avoid outdated waiting list data and to fast track selections of otherwise likely eligible persons when vouchers become available. However, they disagree on whether or not these lists should be limited, as DHCD as proposed. RESPONSE: DHCD can agree to have a different standard for each targeted waiting list, with respect to limiting the number of pre-screened applicants. Therefore, we will not limit the number of Housing Option Program (HOP) and TBRA AIDS/HIV applicants. We will limit the number of other program lists to no more than 25-50 applicants at any one time.
2. JRI Health requested that DHCD commit to assuring that when vouchers are available for issuance that both the HOP and TBRA program be able to issue vouchers up to their established set-aside target, if funding permits. RESPONSE: DHCD can assure JRI Health that when funding permits, each targeted program, including HOP and TBRA, will be able to issue vouchers, up to their prescribed voucher cap.
3. MBHP requested that DHCD reallocate the vouchers we had previously set-aside for certain programs that we have since terminated (because they did not conform to federal fair housing selection requirements) to our remaining targeted programs. RESPONSE: DHCD will not reallocate these vouchers to its remaining targeted programs. These were vouchers that were issued at a time when DHCD was struggling to achieve 100% leasing and we had ample funds to support these voluntary set-asides. In fact, we ended up over-issuing vouchers to support these programs. This situation no longer exists and we are limited to our HUD voucher cap. Currently, 45% of all DHCD participants report at least one disability. Thus, we believe we are adequately using our existing resources to serve persons with disabilities. We will, of course, always apply for new vouchers targeted to persons with disabilities, should they become available.
4. MBHP rejected our suggestion that we merge both the Designated Housing and Mainstream Programs, given their similarity, as a way to reduce the number of set-aside waiting lists, while other stakeholders have verbally advised us that they are not opposed to this action. RESPONSE: DHCD had not determined a course of action at this time, but will do so prior to re-opening issuances in CY 2008..

### **3. VIOLENCE AGAINST WOMEN ACT COMPLIANCE**

#### **COMMENTS**

Greater Boston Legal Services (GBLS) provided extensive comments and recommendations about DHCD's obligation to comply with the Violence Against Women Act (VAWA). We have incorporated almost all of their suggestions, often verbatim, throughout this PHA Plan, in the sections they suggested. We appreciate the work GBLS has done to assist both DHCD and all PHAs to comply with this new statute. Shortly, we will amend our Administrative Plan to outline the procedures that our RAAs must undertake in order to comply with these requirements.

#### **TIMETABLE FOR COMPLETION**

August 31, 2007.

### **4. LIMITED ENGLISH PROFICIENCY (LEP) COMPLIANCE**

#### **COMMENTS**

Greater Boston Legal Services provided the following comments: "Given final HUD guidance, (DHCD's) five-year plan should be amended to include steps to insure that applicants and participants can fully and effectively participate in DHCD's program notwithstanding Limited English Proficiency, and same should be in the annual plan. DHCD should set in motion a process for both making changes to its Section 8 Administrative Plan and to standard notices/forms consistent with LEP, including a Language Access Plan and identifying LEP populations for the various regional non-profits."

#### **RESPONSE**

DHCD acknowledges the importance of taking steps to implement many of the provisions included in HUD's LEP Guidance. In this regard we will:

1. Perform the four factor analysis to determine which populations we need to target in each of our eight regional jurisdictions;
2. Identify documents that the guidance suggests should be translated and make provisions for these translations (documents that HUD will translate excluded);
3. Identify persons/agencies that can provide oral translations, when required;
4. Develop a Language Access Plan;
5. Convene regional LEP working groups to help inform the development of DHCD's Language Access Plan;
6. Amend our Administrative Plan to include a separate chapter on DHCD's LEP initiatives, when this work is completed

#### **TIMETABLE**

We have already initiated the four factor analysis and started internal discussion about further required activity. We will aim to be compliant with LEP guidance provisions by the end of CY 2007.

### **5. REASONABLE ACCOMODATION**

#### **COMMENT**

Greater Boston Legal Services provided the following comments: “DHCD should establish a formal reasonable accommodation policy for its Section 8 program, and include it as a policy available on its web-site and incorporated by reference into its Section 8 administrative plan. This would include identifying at each of the regional non-profits and at DHCD’s Office of Federal Rental Assistance which persons are responsible for responding to requests for reasonable accommodation. Notices and forms should be redesigned to include language of the right of applicants/participants to request reasonable accommodation and how they would go about this. The Boston Housing Authority’s Reasonable Accommodation Policy for its Leased Housing Program could be used as a model.”

#### **RESPONSE**

These are excellent suggestions. We will create a reasonable accommodation policy that we will publish on DHCD’s Bureau of Federal Rental Assistance Programs website, which will also be incorporated into our Administrative Plan. We will ask each regional agency to identify a staff person to take the lead in managing all reasonable accommodation requests. We will also review our forms for amendment and we will review the BHA’s policy for guidance.

#### **TIMETABLE**

We expect to complete this work by July 31, 2007

## **6. HOMELESS PREVENTION**

#### **COMMENT**

Both Metropolitan Boston Housing Partnership (MBHP) and Greater Boston Legal Services provided comments on the importance of homelessness prevention. Other comments referenced homeless prevention, too. MBHP noted that they administer 33% of DHCD’s voucher portfolio, but more than 50% of families entering the state’s shelter system come from the greater Boston area. They noted that while only 30% of the state’s population lives in greater Boston, more than 43% of the Commonwealth’s low-income renters who pay more than 50% of their income to rent live in this metropolitan area. They are particularly concerned that this disparity impacts the ability of minorities and persons with disability to fairly compete for DHCD’s limited pool of vouchers. MBHP requests that DHCD determine a needs-based formula to reallocate vouchers currently in use, on turnover, and to distribute any new resources.

Greater Boston Legal Services provided these comments on DHCD’s role in preventing homelessness: “Consistent with the initiatives underway in Boston through the Boston Homelessness Prevention Clearinghouse (BHPC), DHCD should investigate ways in which regional non-profits could be more pro-active in preventing homelessness. This can include initiatives to help “divert” cases which could otherwise lead to eviction/loss of subsidy/homelessness to obtain appropriate services, counseling, or assistance which would prevent this from occurring. (This could include establishing options for third-party notification for clients with disabilities, limited English proficiency, or other barriers to effective communication, so that there can be timely interventions to avoid loss of subsidy/eviction, as well as setting up electronic fund transfer systems for options for “vending” rent in situations other than those permitted under current law (i.e., in addition to the “protective rent” option that now exists for EAEDC/TAFDC recipients). MBHP’s memorandum about how utility

termination as a tenant HQS violation can be handled is a useful model that can be extended elsewhere.”

#### **RESPONSE**

As noted in our response to comment Number One above, DHCD is currently analyzing data from several sources and will reassess its distribution of vouchers to its eight regional agencies when it completes this analysis. As regards DHCD’s ability to be more proactive in preventing homelessness, we believe that the RAAs’ Housing Consumer Education Centers (HCEC) and other programs they administer are already doing a good job of diverting cases that could result in homelessness, given the resources they have available for this undertaking. However, GBLS has made some very helpful suggestions to do a better job in this regard. We will share these comments with the RAAS and encourage them to incorporate these ideas into each of their existing programs that serve a potentially homeless constituency.

### **7. STRATEGY FOR ADDRESSING SHORTAGE OF AFFORDABLE HOUSING**

#### **COMMENT**

Greater Boston Legal Services provided the following comment: “It would be helpful to get data on what the current lease-up rate is, as well as rent burdens (what percentage of households are paying 30% of income, what percentage 30-35%, 35-40%, etc.) and to know how often DHCD will reassess this. Moreover, this should be provided on a regional non-profit and sub-market basis, as this will inform DHCD of needs to adjust payment standards for particular regional or sub-markets, even if on average lease-up rates or rent burdens are at appropriate levels. Benchmarks of what’s “appropriate” would also be helpful.”

#### **RESPONSE**

We understand that reports on rent burden will eventually be available thru PIC. However, we believe that we can manipulate data in PIC to generate this data without having to wait for it to be automatically available. We, too, are very interested in reviewing this data on a regular basis. We will take proactive steps to seek increased payment standards from HUD if the data shows that more than 40% of our participants in a market area are paying more than 30% of their income for rent.

### **8. COMPLETING PARTICIPANT TERMINATION APPEALS WITHIN 60 DAYS, ESPECIALLY FOR THOSE TENANTS THAT CANNOT REMAIN IN THE UNIT.**

#### **RESPONSE**

DHCD agrees that completing these appeals quickly is very important but notes that each appeal takes an inordinate amount of time to process. We will work with our counsel’s office to identify ways that we can be more responsive in this regard.



State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

[illegible]



	# of families	% of total families	Turnover Avg. 102 per month, 1218 for CY 2006
Waiting List Total	55384		
Income (1)			
Extremely low income <30% AMI	47895	86.5%	
Very low income >30% but <50%	4752	8.6%	
Low income >50% but < 80%	596	1.1%	
Families with children (2)	36410	65.7%	
Elderly families (3)	2326	4.2%	
Families with disabilities (3)	17357	31.3%	
Race/ethnicity (4)			
White/Hispanic	8596	15.5%	
White/non-Hispanic	17360	31.3%	
White/no ethnicity specified	2297	4.2%	
Black/African American/Hispanic	884	1.6%	
Black/African American/non-Hispanic	9490	17.1%	
Black/African American/no ethnicity specified	3010	5.4%	
American Indian/Alaskan Native/Hispanic	120	0.2%	
American Indian/Alaskan Native/non-hispanic	552	1.0%	
American Indian/Alaskan Native/no ethnicity specified	111	0.2%	
Asian or Pacific Islander/Hispanic	94	0.2%	
Asian or Pacific Islander/non-Hispanic	941	1.7%	
Asian or Pacific Islander/no ethnicity specified	317	0.6%	
Native Hawaiian/Other Pacific Islander/Hispanic	341	0.6%	
Native Hawaiian/Other Pacific Islander/non-Hispanic	469	0.9%	
Native Hawaiian/Other Pacific Islander/no ethnicity specified	117	0.2%	
Hispanic, no race specified	8802	15.9%	
Non-hispanic, no race specified	2146	3.9%	
No race or ethnicity specified	1020	1.8%	

(1) Based on HUD income limits as of 3/20/2007

(2) This number represents households with more than one member

(3) Includes households with only one member

(4) Applicants may specify more than one race

## B. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families on the PHA's public housing and Section 8 waiting lists **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

### (1) Strategies

#### **Need: Shortage of affordable housing for all eligible populations**

Because Congress has not funded any new vouchers since FY 2003, PHAs are only able to issue new vouchers from those made available through program attrition. DHCD projects that it will be fully leased throughout CY 2007. Except for PBV units scheduled to come on line during this year we do not anticipate issuing new vouchers. If our projections change because of increased attrition, absorption of our vouchers by other PHAs, unanticipated mod rehab conversions and/or additional vouchers made available through new enhanced voucher contract authority that end up not being utilized in the expiring use/preservation project, we will initiate additional applicant selections before CY 2008. DHCD will continue to pay close attention to payment standards to assure that they are reflective of the rental market and likely to result in optimal housing search success. If necessary, DHCD will make modifications within the payment standard limits prescribed by HUD. Each of DHCD's RAAs will continue to assure that their Section 8 clients are provided with information about rental housing market information through their respective Housing Consumer Education Centers (HCEC).

#### **Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- ☐ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- ☐ Reduce turnover time for vacated public housing units
- ☐ Reduce time to renovate public housing units
- ☐ Seek replacement of public housing units lost to the inventory through mixed finance development
- ☐ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- ☒ Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- ☒ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ☐ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program

- ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- ☐ Other (list below)

**Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- ☒ Apply for additional section 8 units should they become available
- ☒ Leverage affordable housing resources in the community through the creation of mixed - finance housing throughout the Commonwealth - through the creation of mixed - financed housing that links DHCD's project-based vouchers with successful applicants to DHCD's 2007 Winter and Fall Affordable Housing Rental Competitions, through MassHousing's Affordable Housing Trust Fund and possibly other similar development initiatives.
- ☐ Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- ☐ Employ admissions preferences aimed at families with economic hardships
- ☐ Adopt rent policies to support and encourage work
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- ☐ Employ admissions preferences aimed at families who are working
- ☐ Adopt rent policies to support and encourage work
- ☒ Other: (list below) All eligible applicants must have incomes at or below 50% of AMI for all DHCD Section 8 components.

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- ☐ Seek designation of public housing for the elderly

- ☐ Apply for special-purpose vouchers targeted to the elderly, should they become available  
☐ Other: (list below)

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- ☐ Seek designation of public housing for families with disabilities  
☐ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing  
☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available  
☒ Affirmatively market to local non-profit agencies that assist families with disabilities  
☒ Other: (list below)

As of April 16, 2007, 45% of all DHCD participants reported at least one disability. This figure includes general applicants selected from the standard waiting list and households served by one of DHCD's targeted programs for those with disabilities, including the Congressionally-funded and HUD approved Mainstream, Designated Housing and Housing Options programs and the HUD approved TBRA AIDS program.

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- ☐ Affirmatively market to races/ethnicities shown to have disproportionate housing needs  
☒ Other: (list below)

If more vouchers were to become available, DHCD would affirmatively market to those races/ethnicities shown to have disproportionate housing needs. However, because we have over 55,000 applicants on our waiting list at this time, we cannot engage in any additional marketing. Applicants currently on the list have to wait for many years before ever receiving a selection notification.

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- ☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units  
☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations  
☒ Other: See discussion about regional selection preferences and disparate impact in the

## Executive Summary.

### Other Housing Needs & Strategies: (list needs and strategies below)

**Need: Assisting victims of domestic violence, dating violence, sexual assault and stalking to access and retain affordable and safe housing for themselves and their families**

#### **Strategy 1 – Assist Victims Access Affordable Housing**

- X Confidentiality as required by VAWA;**
- X Compliance with VAWA on admissions;**
- X Screening – Approve applications of “eligible” victims of domestic violence, dating violence, stalking and sexual assault who would otherwise be disqualified due to negative history where history is related to the violence.**

#### **Strategy 2 – Assist Victims to Maintain Affordable Housing**

- X Compliance with VAWA on Section 8 voucher terminations;**
- X Compliance with VAWA on permitting victims to break lease where necessary for safety and giving victim new voucher with which to move, including victims residing in project-based voucher units;**
- X Rent calculation where tenant has vacated abuser from household due to domestic violence, RAA shall recalculate family rent subtracting abuser’s income;**
- X Family break-up policy and procedures – consideration of domestic violence.**

#### **Strategy 3 – Look to Consolidated Plan to help identify housing needs of victims of domestic violence, dating violence, stalking and sexual assault.**

### **(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA’s selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Staffing constraints
- ☐ Limited availability of sites for assisted housing
- ☐ Extent to which particular housing needs are met by other organizations in the community
- ☒ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- ☒ Influence of the housing market on PHA programs
- ☐ Community priorities regarding housing assistance
- ☒ Results of consultation with local or state government
- ☒ Results of consultation with residents and the Resident Advisory Board
- ☒ Results of consultation with advocacy groups
- ☐ Other: (list below)

## 2. Statement of Financial Resources

[24 CFR Part 903.12 (b), 903.7 (c)]

List on the following table the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
<b>1. Federal Grants (FY 20__ grants)</b>		
a) Public Housing Operating Fund		
b) Public Housing Capital Fund		
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$205m	
f) Resident Opportunity and Self-Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
<b>3. Public Housing Dwelling Rental Income</b>		
<b>4. Other income (list below)</b>		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
4. Non-federal sources (list below)		
Total resources		

### 3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.12 (b), 903.7 (b)]

#### A. Public Housing **DHCD does not administer public housing units.**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

#### B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

##### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- ☒ Criminal or drug-related activity only to the extent required by law or regulation  
☐ Criminal and drug-related activity, more extensively than required by law or regulation  
☐ More general screening than criminal and drug-related activity (list factors):  
☐ Other (list below)

b. ☐ Yes ☒ No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c. ☒ Yes ☐ No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d. ☐ Yes ☒ No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- ☐ Criminal or drug-related activity  
☒ Other (describe below) In no case will any information regarding the fact that an individual or a member of her household is a victim of domestic violence, dating violence, or stalking and/or that an individual or a member of her household has provide a HUD approved

certification form or other documentation pursuant to 42 U.S.C. Section 1437f(ee)(1) to an owner, manager, or public housing agency be shared with prospective landlords except with the written consent of the applicant or participant except as may be required for use in an eviction proceeding or otherwise provided by 42 U.S.C. Section 147f(ee)(1). Neither shall this information be entered into any databased share with any person or entity.

## **(2) Waiting List Organization**

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- ☒ None  
☐ Federal public housing  
☐ Federal moderate rehabilitation  
☐ Federal project-based certificate program  
☐ Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- ☒ PHA main administrative office  
☒ Other At any of the RAA offices, or by mail. The application is available on DHCD's web-site at: [www.mass.gov/dhcd/](http://www.mass.gov/dhcd/) ; >Public Housing and Rental Assistance; >Bureau of Federal Assistance.

## **(3) Search Time**

a. ☒ Yes ☐ No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below: The RAA can elect to require evidence of a good faith housing search before providing a 30 day extension. A second 30 day extension may be provided for reasonable accommodation or other good cause, as detailed in DHCD's Administrative Plan. If the dynamics in the current rental housing market (generally favorable to renters) change and result in fewer vacancies and higher overall rents, DHCD will amend its policy to allow an automatic 60 day extension for all voucher holders. The RA shall extend the 30 or 60 day extension where the participant/applicant can reasonably demonstrate that domestic violence, dating violence, stalking or sexual assault has interfered with her or his ability to search for appropriate housing or where safety issues mandate particular types of housing or locations of housing. The RAA shall suspend the voucher search time on a case by case basis where an applicant or participant is unable to search for housing for reasons related to domestic violence, dating violence, stalking or sexual assault.

## **(4) Admissions Preferences**



a. Income targeting

- ☐ Yes ☒ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

DHCD does not use preferences for applicants with incomes at or below 30% of AMI. However, applicants with incomes between 31%-50% of AMI must meet certain former federal preferences.

All single persons, regardless of age or disability, are selected chronologically for our Mod Rehab or PBV SRO and enhanced single occupancy units (ESRO). ESRO units are those that generally have either a separate bath or kitchenette facilities.

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)  
Only for applicants with incomes between 31%-50% of AMI and all preferences are considered equally.

Former Federal preferences

- ☒ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
☐ Victims of domestic violence  
☒ Substandard housing  
☒ Homelessness  
☒ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability  
☐ Veterans and veterans' families  
☒ Residents who live and/or work in your jurisdiction  
DHCD has a regional residency preference for each of 8 regions statewide.  
See discussion on a potential disparate impact consequence in the executive summary.

- ☐ Those enrolled currently in educational, training, or upward mobility programs  
☐ Households that contribute to meeting income goals (broad range of incomes)  
☐ Households that contribute to meeting income requirements (targeting)  
☐ Those previously enrolled in educational, training, or upward mobility programs  
☐ Victims of reprisals or hate crimes  
☐ Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space

that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

☒ Date and Time

All applicants, regardless of income, are selected by date and time from one of the 8 regional waiting lists. Preference consideration, as described below, is only applicable to those applicants with incomes between 31%-50% of AMI.

Former Federal preferences:

- ☒ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☒ Substandard housing
- ☒ Homelessness
- ☒ High rent burden

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- ☒ Residents who live and/or work in your jurisdiction  
DHCD has a regional residency preference for each of its eight regions. See discussion in the executive summary about possible disparate impact.
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- ☒ Date and time of application
- ☐ Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- ☒ This preference has previously been reviewed and approved by HUD  
To further the creation of permanently affordable rental housing, DHCD may provide a limited local residency preference for up to 50% of the PBV units developed pursuant to certain PBV development projects *only* in those communities where the local housing authority does not have its own Section 8 vouchers available for such PBV projects (or the community does not have a LHA) *and* the project would not otherwise be approved by the city/town without a local residency preference. The owner will be required to submit evidence from the city or town that these conditions have been met prior to

**DHCD consideration of granting this limited local residence preference.**

☐ The PHA requests approval for this preference through this PHA Plan

**6. Relationship of preferences to income targeting requirements: (select one)**

☐ The PHA applies preferences within income tiers

☒ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

☒ The Section 8 Administrative Plan

☐ Briefing sessions and written materials

☒ Other : **Moving to Work (MTW) Demonstration Program Administrative Plan**

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

☐ Through published notices

☒ Other:

DHCD's special programs are described in its Administrative Plan, which is posted on DHCD's website @ [www.mass.gov/dhcd/](http://www.mass.gov/dhcd/); >Public Housing and Rental Assistance; >Bureau of Federal Rental Assistance. Additionally, DHCD meets regularly with staff from the Commonwealth's various human service commissions and with various service providers. These frequent contacts allow us to keep these stakeholders informed of our various programs and updated on the status of each programs' respective waiting time. DHCD may need to adjust capacity levels within its overall portfolio for a number of its special purpose programs during the coming years due to funding and regulatory changes. Two of DHCD's special programs, the JOBLink Welfare-to-Work Housing Voucher Program, and the Moving to Work Demonstration Program, both targeted to homeless or at-risk families leaving welfare for work, have been re-examined with respect to program size and eligibility criteria in order to be sure that the programs will be effective in serving the target populations. With the extension of DHCD's Moving to Work Demonstration Program for an additional three years through 2009, active recruitment for new participants in the southern Worcester County and greater Boston component is being done through outreach to local DTA (welfare) offices, community-based organizations, faith-based organizations and educational institutions.

DHCD will apply to HUD for any additional Section 8 voucher funds that are specifically targeted to victims of domestic violence, dating violence, stalking, sexual assault, reprisals or hate crimes who are at imminent risk of life-threatening harm to themselves or their children. DHCD will work in partnership with the District Attorneys to develop appropriate referral criteria that identifies which applicants would qualify for these vouchers.

N.B. Approximately 50% of all DHCD Family Unification Program (FUP) vouchers are used by

victims of domestic violence referred by DSS.

## **6. Portability**

The RAA shall provide an exception to the prohibition against a family moving under the portability provisions in violation of the lease and will provide a family a new voucher with which the family can move if the family has complied with all other obligations of the voucher program where the participant must move or has moved out of the assisted dwelling unit in order to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit.

## **7. PHA Notification to Tenants and Owners Participating in Section 8 Programs**

The RAAs will provide notice to tenants assisted under Section 8 of the United States Housing Act of 1937 of their rights, and notice to owners and managers of their rights and obligations under section 8 as amended by VAWA specifically regarding admissions, portability, evictions and terminations of subsidy.

## **4. PHA Rent Determination Policies**

[24 CFR Part 903.12(b), 903.7(d)]

### **B. Section 8 Tenant-Based Assistance**

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

#### **(1) Payment Standards**

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- ☐ At or above 90% but below 100% of FMR  
☒ 100% of FMR  
☒ Above 100% but at or below 110% of FMR  
☒ Above 110% of FMR (if HUD approved; describe circumstances below)

DHCD establishes payment standards for each metropolitan and non-metropolitan statistical area within the Commonwealth. Our standards are established based on rental market data in each respective jurisdiction. DHCD utilizes HUD-approved exception standards above 110% of FMR only in those communities where HUD has granted this exception.

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- ☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ The PHA has chosen to serve additional families by lowering the payment standard
- ☐ Reflects market or submarket
- ☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- ☒ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☒ Reflects market or submarket
- ☒ To increase housing options for families
- Other:

d. How often are payment standards reevaluated for adequacy? (select one)

☒ Annually

☒ Other:

If market trends suggest a very significant change in a particular rental market within a year's time, DHCD will evaluate its payment standard for that market more frequently than once a year, and make changes, if warranted.

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

☒ Success rates of assisted families

☒ Rent burdens of assisted families

☒ Other: On-going review of unassisted rent comps collected by each RAA on a regular basis.

## **(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

☐ \$0

☒ \$1-\$25

☐ \$26-\$50

b. ☒ Yes ☐ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

1. The family has lost eligibility and is awaiting an eligibility determination for a Federal, State or local assistance program;

2. The family would be evicted as a result of the minimum rent requirement;

3. The income of the family has decreased because of changed circumstances, including the loss of employment;

4. A death in the family has occurred.

5. The income of the family has decreased because of domestic violence, dating violence, or sexual assault of which a household member has been a victim. This shall not apply where the perpetrator remains physically in the household.

### **3. Rent re-determination where loss of income is due to domestic violence, dating violence, stalking or sexual assault.**

Upon notification that an existing tenant is a victim of domestic violence, dating violence, stalking or sexual assault and has taken steps to or has removed the perpetrator of such violence from the unit, the RAA shall recalculate the household's portion of the rent subtracting the perpetrator's income from the household's total income. The new portion of rent shall be made effective retroactive to the existing tenant's loss of income.

### **5. Capital Improvement Needs**

**Not applicable to DHCD as a Section 8 only PHA.**

[24 CFR Part 903.12(b), 903.7 (g)]

Exemptions from Component 5: Section 8 only PHAs are not required to complete this component and may skip to Component 6.

### **7. Section 8 Tenant Based Assistance--Section 8(y) Homeownership Program**

[24 CFR Part 903.12(b), 903.7(k)(1)(i)]

- (1) Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If "No", skip to the next component; if "yes", complete each program description below (copy and complete questions for each program identified. Providing homeownership opportunities to HCVP participants is a very labor intensive undertaking. HUD has not provided sufficient administrative funds to make it possible for DHCD to administer a statewide voucher homeownership program. However, during 2007, DHCD and its regional administering agencies will discuss the possibility of administering a very small scale homeownership program for FSS participants and graduates and will make all relevant administering documents available on its webpage prior to implementation.

(

### **8. Civil Rights Certifications**

[24 CFR Part 903.12 (b), 903.7 (o)]

Civil rights certifications are included in the *PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans*, which is submitted to the Field Office in hard copy—see Table of Contents.

### **9. Additional Information**

[24 CFR Part 903.12 (b), 903.7 (r)]

## **A. PHA Progress in Meeting the Mission and Goals Described in the 5-Year Plan**

*(Provide a statement of the PHA's progress against the goals and objectives established in the previous 5-Year Plan for the period FY 2005 - 2009:*

**HUD Strategic Goal: Increase the availability of decent, safe and affordable housing:**

### **RE: TENANT BASED VOUCHERS**

#### **PHA Goal: Expand the supply of assisted housing**

DHCD actively pursued all funding opportunities for both incremental and special needs vouchers through FFY 2002. Beginning in FFY 2003, Congress stopped appropriating funds for new vouchers, thereby diminishing the availability of decent, safe and affordable housing opportunities for applicants on any PHA's Section 8 waiting list.

In 2000, DHCD was awarded 100 FUP vouchers, 438 fair share vouchers and two thousand (2000) Welfare-to-Work vouchers.

In 2001, DHCD was awarded 100 FUP vouchers and 528 fair share vouchers.

In 2002, DHCD was awarded 38 FUP vouchers and 151 additional Welfare-to-Work vouchers.

DHCD applied for, but did not receive fair share vouchers in 2002, due to a HUD funding error. By the time HUD acknowledged the error, they did not have sufficient funds available to compensate DHCD for this funding oversight.

DHCD applied for, but did not receive, Mainstream vouchers in 2003 (selections were done randomly).

Additionally, during this period, DHCD worked with the MA Executive Office of Health and Human Services and subsequently the MA Department of Transitional Assistance, to apply for new and renewal funding under the McKinney-Vento Homeless Assistance Programs to provide new, and maintain existing, affordable Housing Options for homeless individuals and families with disabilities through the So-called Balance of State Continuum of Care.

#### **Update for 2007:**

In spite of no new voucher funding since 2002, in CY 2006, DHCD's regional agencies selected 9,224 applicants and leased 1,045 new households. We ended CY 2006 100% leased. Because of low turnover and commitments currently outstanding for PBV units coming on-line in 2007 and the number of new

voucher

holders currently searching for housing, DHCD does not expect to select any new applicants until the end of 2007 in order that DHCD can stay within its budget authority and voucher unit cap.



*HUD Strategic Goal: Increase the availability of decent, safe and affordable housing:*

**Continuation of a vigorous PBV program component**

DHCD will continue its commitment to support PBV units, up to 20% of its budget authority, the maximum permitted by HUD. DHCD will continue to make available up to 100 PBVs to projects competitively selected in one of DHCD's bi-annual One Stop Affordable Housing Rental Competitions in 2007, and MassHousing's Affordable Housing Trust fund competition, provided these units will not come on line until CY 2008.

Because we project to be fully leased in 2007, we have temporarily shut down our "existing" PBV NOFA, effective February 26, 2007. If our projections change during the year, we will publicly announce the re-opening of this NOFA.

**PHA Goal: Increase assisted housing choices**

Over the past six years, DHCD's Section 8 Housing Quality Inspection Manager has worked tirelessly with each of the RAAs to help them more effectively communicate unit findings to current and prospective owners and to link a "unit grade" to the final rent offered. Units that receive a lower grade are not eligible for the maximum rent that could be offered to a similarly-sized unit in better condition. The inspectors encourage owners to make needed repairs so that the unit can achieve a higher grade. The higher unit grade serves as an incentive to the owner to invest in the property. DHCD's effective use of this tool, in tandem with more highly trained inspection teams, has resulted in better quality rental housing on DHCD's voucher program. A description of DHCD's unit grade policy can be found in the Inspection section of its Section 8 HCVP Administrative Plan.

Shortly after the April 17, 2000 submission of DHCD's first 5-Year PHA Plan, The MA Legislature appropriated funds for nine Housing Consumer Education Centers (HCEC). Each of DHCD's RAAs manages the HCEC in their respective jurisdiction. The goal of the HCECs is to provide "one stop shopping" for housing-related information and referrals (I+R) for all housing consumers and providers. Since their inception, the HCECs have assisted thousands of consumers who seek information on assisted housing choices in MA. Requests for I+R increased 68% between FY 2002 and FY 2005, from 11,542 requests to 19,407 requests. In FY 2006 additional staffing and financial resources were made available, resulting in the HCEC's ability to serve nearly double the number of I+R requests – 36,274 in FY 2006. Multiple housing stakeholders, public and private agencies, elected federal and state officials now routinely refer consumers to the HCECs for housing-related I+R.. The HCECs provide information on multiple housing programs and options available in MA, via their webpage, ([www.masshousinginfo.org](http://www.masshousinginfo.org)), by phone and on-site at their respective offices. Both DHCD and local housing authority voucher holders are welcome in each respective HCEC resource room, where up-to-date information about available rental programs and unit

listings is provided.

## **2. HUD Strategic Goal: Promote self-sufficiency and asset development of families And individuals**

### **PHA Goal: Promote self-sufficiency and asset development of assisted households.**

DHCD operates the HUD Family Self Sufficiency Program (FSS), the Moving To Work (MTW) Demonstration Program, and the JOBLink Welfare-to-Work Housing Voucher Program, each with the express goal of promoting employment, self-sufficiency, and asset development among participating families. In addition, DHCD's RAAs continue to provide opportunities for interested voucher program participants to learn about, pursue, and achieve homeownership through a variety of collaborative efforts.

a) Increase the number and percentage of employed persons in assisted families:

DHCD's well established and successful FSS program continued to grow during the period 2000-2004, and into 2005, consistently exceeding our mandatory minimum program size. Over the past four fiscal years (2002-2006) an average of 93% of all FSS graduates receive an escrow account balance, clearly demonstrating an increase in their employment earnings during FSS participation.

	6/30/00	6/30/01	6/30/02	6/30/03	6/30/04	6/30/05	6/30/06
Number of graduates during previous year	82	66	67	94	74	76	91
Mandatory FSS program size	556	490	423	329	255	179	88
# FSS Participants	625	666	700	742	756	645	608

b) Provide or attract supportive services to improve assistance in recipients' employability:

Local, regional, and statewide networks have developed to support these specific programs and all HCVP participants. The trend toward more joint, rather than program-specific, advisory groups and meetings has continued at all levels, resulting in greater information-sharing and collaborative efforts. In addition to greater depth in local/regional networks between the RAAs and their service providers, DHCD has become increasingly involved in statewide employment development efforts through participation in the State Workforce Investment Board.

c) Provide or attract supportive services to increase independence for the elderly or families with disabilities:

DHCD has continued to require that all Housing Options Program (HOP) subsidies in its portfolio be matched with service dollars and delivery of services by appropriate providers to support housing stability for vulnerable households and expanded personal and economic opportunities. For other special needs-connected programs, including McKinney Shelter Plus Care and SRO, DHCD meets regularly with representatives from other state human service agencies, leading to better coordination of participant support efforts at the state and local levels.

d) Other (Moving to Work, and Seek New Resources):

DHCD continues to operate a successful MTW Demonstration Program, through which participants have built solid employment records in preparation for greater independence. Since its inception, 20 families have become homeowners, representing 16% of all MTW graduates. DHCD and RAA staff continue to seek new resources and programs to promote self-sufficiency and asset building for participants, including employment and housing linkages through the HCEC networks and first-time homebuyers preparation.

### **3. HUD Strategic Goal: Ensure equal opportunity for all Americans**

#### **PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives.**

DHCD has continued to rigorously enforce all fair housing and anti-discrimination laws and policies in the administration of its HCVP.

Additionally, DHCD immediately seeks HUD approval for reasonable accommodation on behalf of all clients who have provided verifiable evidence of need for extra rooms, higher rents or other types of accommodation.

DHCD's greater Boston area RAA, the Metropolitan Boston Housing Partnership (MBHP,) significantly exceeded the housing goals established by HUD as part of a Skinner consent decree initiative funded by HUD and designed by MBHP, called the Community Choice Voucher Program (CCVP). This initiative is targeted to minority families residing in the city of Boston who want to move to a more racially diverse community. It is a program that combines rental assistance and case management to ensure that clients have the skills and resources needed to make a successful transition. MBHP was provided with \$160,000 to support this initiative and has successfully raised private funds to continue their support for their CCVP clients. MBHP far exceeded the goal of assisting 43 households. Currently, 72 minority households have moved to a more

racially diverse neighborhood, and MBHP hopes and expects to assist additional families in the coming year.

**3. HUD Strategic Goal: Assist victims of domestic violence, dating violence, sexual assault and stalking to access and retain affordable and safe housing for themselves and their families.**

As indicated throughout this PHA Plan, DHCD will fully comply with VAWA requirements in all aspects of its administration of the HCVP.

## **B. Criteria for Substantial Deviations and Significant Amendments**

### **(1) Amendment and Deviation Definitions**

24 CFR Part 903.7(r)

PHAs are required to define and adopt their own standards of substantial deviation from the 5-year Plan and Significant Amendment to the Annual Plan. The definition of significant amendment is important because it defines when the PHA will subject a change to the policies or activities described in the Annual Plan to full public hearing and HUD review before implementation.

#### **a. Substantial Deviation from the 5-Year Plan**

- The addition of new activities that do not otherwise further DHCD's stated mission or further the goals as set forth in the current 5-year plan.
- Insufficient budget authority from HUD necessitating need to terminate program participants.
- An exception to this definition will be made for any new activities that are adopted to reflect changes in statute or HUD regulatory requirements; such changes will not be considered a substantial deviation by DHCD.

#### **b. Significant Amendment or Modification to the Annual Plan**

- Significant changes to rent or admissions policies or organization of the waiting list;
- Addition of new program initiatives not included in the current plan;
- Any changes DHCD might initiate using the broad authority it has to develop policies and procedures outside of the normal regulatory environment as an MTW agency.

An exception to this definition will be made for any of the above that are adopted to reflect changes in statute or HUD regulatory requirements; such changes will not be considered significant amendments by DHCD.

## **C. Other Information**

[24 CFR Part 903.13, 903.15]

## (1) Resident Advisory Board Recommendations

- a. ☒ Yes ☐ No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

If yes, provide the comments below:

DHCD held its annual Participant Advisory Board (PAB) meeting in Framingham, Massachusetts on Saturday, March 24, 2007. Twenty-three (23) participants in DHCD's Housing Choice Voucher Program, representing eleven communities in Massachusetts met to discuss a variety of aspects of the HCV Program, review the draft PHA Plan, and share ideas about possible future modifications to the program. Input was received through facilitated large group discussion and a written questionnaire.

DHCD's Director of the Bureau of Federal Rental Assistance, Mary-Anne Morrison, provided an overview of the meeting and of the draft PHA Plan. A substantial amount of time was devoted to general comments and conversation about the program and its operations. Most comments did not have specific application to the specifics proposed in the draft PHA Plan, with the exception of strong support for the implementation of the homeownership option.

Looking toward the future, PAB members were presented with a series of possible changes being discussed at the national level and as a part of DHCD's 2007 Annual Plan, and asked to respond to them.

In light of limited resources and continuing needs, inspections and regional voucher allocations were discussed. With regard to **inspections**, PAB members felt that while the inspection process is not always convenient, they value the annual inspections because they safeguard participants' rights to quality housing, provide an important opportunity to raise concerns about the unit, and provide an educational opportunity for future homeownership. PAB participants recognized the dilemma facing DHCD in considering possible modifications to the allocation of its vouchers to ensure equal access and housing choice for households throughout the state, but did not have any specific suggestions or preferences with regard to possible **voucher allocation** options. There was interest in the idea of **rent simplification/changing rent calculations**, though it was quickly acknowledged that no matter how they may be changed, some households would probably "win" and some might "lose," and that care should be taken not to penalize working parents. Many participants felt that using gross income was problematic. **Preparation for self-sufficiency** already occurs through the popular Family Self-Sufficiency Program, which many participants spoke highly about, but some participants felt that FSS or other work activities should be mandatory, not voluntary (with some exemptions for disabled persons) for HCVP participants.

Written comments were solicited through an open-response questionnaire. These comments highlighted PAB members interest in the Family Self-Sufficiency Program (FSS) and homeownership, generally, and DHCD's implementation of the Homeownership option

specifically, as well as concerns about education/communication (with and among the administering agencies, participants, and property owners) and annual inspections (scheduling, how to make them more efficient for all involved).

In response to the PAB's feedback, DHCD does not need to make any changes to the PHA Plan as drafted and submitted to the PAB, but intends to use the input to inform decisions as they may arise over the coming year as the national discussion about HCVP continues. DHCD will continue to work to increase opportunities for participants through its HUD Family Self-Sufficiency Program, state-funded Housing Consumer Education Centers, and will work with its subcontractors to enhance communication/education activities, especially with regard to inspections.

b. In what manner did the PHA address those comments? (select all that apply)

☒ Considered comments, but determined that no changes to the PHA Plan were necessary.

☐ The PHA changed portions of the PHA Plan in response to comments  
List changes below:

☐ Other: (list below)

## (2) Resident Membership on PHA Governing Board

The governing board of each PHA is required to have at least one member who is directly assisted by the PHA, unless the PHA meets certain exemption criteria. Regulations governing the resident board member are found at 24 CFR Part 964, Subpart E.

**Not applicable. DHCD is a Section 8 only PHA.**

a. Does the PHA governing board include at least one member who is directly assisted by the PHA this year?

☐ Yes ☐ No:

If yes, complete the following:

Name of Resident Member of the PHA Governing Board:

Method of Selection:

☐ Appointment

**The term of appointment is (include the date term expires):**

☐ Election by Residents (if checked, complete next section--Description of Resident Election Process)

## Description of Resident Election Process

Nomination of candidates for place on the ballot: (select all that apply)

- ☐ Candidates were nominated by resident and assisted family organizations
- ☐ Candidates could be nominated by any adult recipient of PHA assistance
- ☐ Self-nomination: Candidates registered with the PHA and requested a place on ballot
- ☐ Other: (describe)

Eligible candidates: (select one)

- ☐ Any recipient of PHA assistance
- ☐ Any head of household receiving PHA assistance
- ☐ Any adult recipient of PHA assistance
- ☐ Any adult member of a resident or assisted family organization
- ☐ Other (list)

Eligible voters: (select all that apply)

- ☐ All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- ☐ Representatives of all PHA resident and assisted family organizations
- ☐ Other (list)

b. If the PHA governing board does not have at least one member who is directly assisted by the PHA, why not?

- ☐ The PHA is located in a State that requires the members of a governing board to be salaried and serve on a full time basis
- ☐ The PHA has less than 300 public housing units, has provided reasonable notice to the resident advisory board of the opportunity to serve on the governing board, and has not been notified by any resident of their interest to participate in the Board.
- ☐ Other (explain):

Date of next term expiration of a governing board member:

Name and title of appointing official(s) for governing board (indicate appointing official for the next available position):

### **(3) PHA Statement of Consistency with the Consolidated Plan**

[24 CFR Part 903.15]

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

**Consolidated Plan jurisdiction:** **Commonwealth of Massachusetts**

a. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply):

- ☒ The PHA has based its statement of needs of families on its waiting list on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other:

**DHCD prepares the 5-Year Consolidated Plan and the Annual Action Plan for the 315 “non-entitlement” communities in MA. On April 1, 2005, DHCD published and posted its FY 2005-2009 Consolidated Plan which included the FY 2005 Action Plan on its website. In December 2006, the FY 2007 Action Plan was submitted to HUD and published and posted online. Below is an excerpt from the Consolidated Plan’s Executive Summary that addresses how the Commonwealth supports DHCD’s PHA Plan:**

**“The 2005-2009 Consolidated Plan provides the framework for the Commonwealth’s continuing investment to help meet the housing and community development needs of its residents and municipalities. It lays out the state’s long-term objectives and the strategies by which it will achieve these objectives, using funds received from HUD under the four programs covered by the Plan as well as other sources the state expects to have available. It identified the state’s housing and community development needs and priorities, and establishes the criteria by which projects will be selected for funding. The state’s housing and community development needs were identified by citizens in public forums, interviews with program administrators, beneficiaries and other stakeholders, and a thorough analysis of socioeconomic and housing market conditions. Particular attention was paid to the needs of the homeless and those with special needs.**

## **HOUSING AND COMMUNITY DEVELOPMENT GOALS AND OBJECTIVES**

**The overarching goal of the Commonwealth’s housing and community development efforts is to provide broad economic opportunity and a high quality of life for all Massachusetts residents. The six objectives established for the 2005-2009 Consolidated Plan reflect that goal:**

- 1. Develop and maintain an adequate supply of safe, decent housing that is affordable and accessible to residents with a range of income levels and household needs.**
- 2. Promote sustainable homeownership opportunities for low, moderate and middle income families.**
- 3. Reduce chronic and family homelessness by providing a viable continuum of care.**
- 4. Ensure that Massachusetts residents with long-term support needs have access to appropriate services and accessible, community housing options that maximize consumer choice.**
- 5. Enhance the prosperity and economic well-being of all regions of the state, ensuring that economic growth is compatible with community and environment.**



## 6. Ensure full and fair access to housing for all residents.

In its execution of the plan, DHCD and its partner agencies will be guided by these five fundamental principles:

1. Promote Fair Housing
2. Promote sustainable development
3. Enhance the capacity of community based organizations and local government
4. Remove barriers to affordable housing production
5. Improve the outcomes of government action

b. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

(4) (Reserved)

Use this section to provide any additional information requested by HUD.

## 10. Project-Based Voucher Program

- a. ☒ Yes ☐ No: Does the PHA plan to “project-base” any tenant-based Section 8 vouchers in the coming year? If yes, answer the following questions.
- b. ☒ Yes ☐ No: Are there circumstances indicating that the project basing of the units, rather than tenant-basing of the same amount of assistance is an appropriate option?

If yes, check which circumstances apply:

- ☒ Low utilization rate for vouchers due to lack of suitable rental units
- ☒ Access to neighborhoods outside of high poverty areas
- ☒ Other (describe below:) Using PBVs to preserve properties that may otherwise no longer be affordable to low income households.

- c. Indicate the number of units and general location of units (e.g. eligible census tracts or smaller areas within eligible census tracts):

The following PBV projects came on line in CY 2006:

### EXISTING PBVs:

Paradise Pond	Northampton	8
Pelham House	Newton	3
Westport Village	Westport	12
Amory Street	Boston	7
Ruggles	Boston	41

S. Total: 71

**DEVELOPMENT PBVs:**

Westhampton Senior	Westhampton	3
Stonybrook	Westford	4
Winter St.	Haverhill	13

S. Total: 20

**Grand Total: 91 PBV units in CY 2006.**

## 11. List of Supporting Documents Available for Review for Streamlined Five-Year/ Annual PHA Plans

PHAs are to indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Related Plan Component
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans.</i>	Standard 5 Year and Annual Plans; streamlined 5 Year Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan.	5 Year Plans
X	Fair Housing Documentation Supporting Fair Housing Certifications: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Housing Needs Statement of the Consolidated Plan for the jurisdiction(s) in which the PHA is located and any additional backup data to support statement of housing needs for families on the PHA’s public housing and Section 8 tenant-based waiting lists.	Annual Plan: Housing Needs
	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
	Public Housing Admissions and (Continued) Occupancy Policy (A&O/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP] and the Site-Based Waiting List Procedure.	Annual Plan: Eligibility, Selection, and Admissions Policies
	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. <input type="checkbox"/> Check here if included in the public housing A&O Policy.	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
	Public housing rent determination policies, including the method for setting public housing flat rents. <input type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
	Schedule of flat rents offered at each public housing development. <input type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not	Annual Plan: Rent

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Related Plan Component
	necessary as a supporting document) and written analysis of Section 8 payment standard policies. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Determination
	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and Maintenance
	Results of latest Public Housing Assessment System (PHAS) Assessment (or other applicable assessment).	Annual Plan: Management and Operations
	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance and Community Service & Self-Sufficiency
<input checked="" type="checkbox"/>	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations
<input checked="" type="checkbox"/>	Any policies governing any Section 8 special housing types <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance
	Consortium agreement(s).	Annual Plan: Agency Identification and Operations/ Management
	Public housing grievance procedures <input type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Grievance Procedures
<input checked="" type="checkbox"/>	Section 8 informal review and hearing procedures. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Grievance Procedures
	The Capital Fund/Comprehensive Grant Program Annual Statement /Performance and Evaluation Report for any active grant year.	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants.	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans, or any other approved proposal for development of public housing.	Annual Plan: Capital Needs
	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing Section 504 of the Rehabilitation Act and the Americans with Disabilities Act. See PIH Notice 99-52 (HA).	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing.	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans).	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act, Section 22 of the US Housing Act of 1937, or Section 33 of the US Housing Act of 1937.	Annual Plan: Conversion of Public Housing
	Documentation for required Initial Assessment and any additional information required by HUD for Voluntary Conversion.	Annual Plan: Voluntary Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans.	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program (Section _____ of the Section 8 Administrative Plan)	Annual Plan: Homeownership
	Public Housing Community Service Policy/Programs <input type="checkbox"/> Check here if included in Public Housing A & O Policy	Annual Plan: Community Service & Self-Sufficiency
	Cooperative agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies.	Annual Plan: Community Service & Self-Sufficiency
<input checked="" type="checkbox"/>	FSS Action Plan(s) for public housing and/or Section 8.	Annual Plan: Community Service & Self-Sufficiency

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Related Plan Component</b>
	Section 3 documentation required by 24 CFR Part 135, Subpart E for public housing.	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports for public housing.	Annual Plan: Community Service & Self-Sufficiency
	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G). <input type="checkbox"/> Check here if included in the public housing A & O Policy.	Pet Policy
<b>X</b>	The results of the most recent fiscal year audit of the PHA conducted under the Single Audit Act as implemented by OMB Circular A-133, the results of that audit and the PHA's response to any findings.	Annual Plan: Annual Audit
	Consortium agreement(s), if a consortium administers PHA programs.	Joint PHA Plan for Consortia
	Consortia Joint PHA Plans ONLY: Certification that consortium agreement is in compliance with 24 CFR Part 943 pursuant to an opinion of counsel on file and available for inspection	Joint PHA Plan for Consortia
	Other supporting documents (optional). List individually.	(Specify as needed)